LeMond Cycling, Inc. v. Trek Bicycle Corporation Doc. 148

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LeMond Cycling, Inc.,

Plaintiff,

v.

Trek Bicycle Corporation,

Defendant/Third-Party Plaintiff,

v.

Greg LeMond,

Third-Party Defendant.

Civil No. 08-1010 (RHK-JSM)

Judge Richard H. Kyle
Magistrate Judge Janie S. Mayeron

SECOND DECLARATION OF JENNIFER M. ROBBINS IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

I, Jennifer M. Robbins, hereby declare as follows:

1. I am one of the attorneys representing Plaintiff LeMond Cycling, Inc. and Third-Party Defendant Greg LeMond in this case. I make this declaration in support of Plaintiff's Motion for Summary Judgment.

2. Attached to this Declaration as Exhibit 77 is a true and correct copy of a letter from Jennifer M. Robbins of Robins, Kaplan, Miller & Ciresi L.L.P. to Trek counsel dated April 7, 2009.

Dockets.Justia.com

3. Attached to this Declaration as Exhibit 78 is a true and correct copy of the relevant pages of the deposition transcript of Greg LeMond.

4. Attached to this Declaration as Exhibit 79 is a true and correct copy of the relevant pages of the deposition transcript of Warren Gibson.

5. Attached to this Declaration as Exhibit 80 is a true and correct copy of the relevant pages of the deposition transcript of Thomas Fox.

6. Attached to this Declaration as Exhibit 81 is a true and correct copy of the relevant pages of the deposition transcript of John R. Nevin.

7. Attached to this Declaration as Exhibit 82 is a true and correct copy of the relevant pages of the deposition of John Burke.

8. Attached to this Declaration as Exhibit 83 is a true and correct copy of the relevant pages of the deposition transcript of Ira Langer.

9. Attached to this Declaration as Exhibit 84 is a true and correct copy of *Nader v. ABC Television, Inc.*, No. 04-5034-CV, 2005 WL 2404546 (2d Cir. Sept. 30, 2005).

10. Attached to this Declaration as Exhibit 85 is a true and correct copy of Exhibits 128, 129, 130, and 131 from the deposition of Warren Gibson.

11. Attached to this Declaration as Exhibit 86 is a true and correct copy of correspondence between Sidney Bluming and Bob Burns from July, 1999.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of August, 2009.

/s/ Jennifer M. Robbins
Jennifer M. Robbins